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May 25, 2023

**BY E.C.F.**

Honorable John G. Koeltl  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

APPLICATION GRANTED  
SO ORDERED

*5/25/23* *John G. Koeltl*  
John G. Koeltl, U.S.D.J.

Re: Jamel Purnell v. Williams, et al.  
22-CV-5956 (JGK)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney for Defendant the City of New York (“City”) in the above referenced matter. The City writes to respectfully request a thirty (30) day extension of time from June 5, 2023 to July 5, 2023, to submit a pre-motion conference letter pursuant to Rule II.B of Your Honor’s Individual Practice Rules.

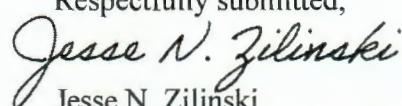
This is the City’s first request for an extension of time to submit a pre-motion conference letter. Due to the timing of this request and Plaintiff’s incarceration status, the City was unable to obtain Plaintiff’s position. As this request affects the deadlines endorsed by the Court on March 13, 2023, a proposed revised scheduling order is attached pursuant to Your Honors’ Individual Practice Rules.

By way of relevant background, discovery in this case closed on May 5, 2023. (See ECF No. 21.) Thus, the City’s prospective pre-motion conference letter concerning its anticipated summary judgment motion is due by June 5, 2023.

However, while the City anticipates submitting a pre-motion conference letter, due to scheduling conflicts and other time sensitive matters, the City requires additional time to afford it an opportunity to thoroughly review the record and prepare a comprehensive request for a pre-motion conference.

Accordingly, the City respectfully requests a thirty (30) day extension of time from June 5, 2023 to July 5, 2023, to submit a pre-motion conference letter.

The City thanks the Court for its consideration herein.

Respectfully submitted,  
  
Jesse N. Zilinski  
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Encl.

CC: **BY FIRST CLASS MAIL**

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